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February 23, 2022

VIA ECF

The Honorable Kiyo A. Matsumoto
United States District Court
Eastern District of New York

Re: AMCM Glove LLC v. iConn, Inc.

Case No. 1:21-cv-06863-KAM-JRC

Dear Judge Matsumoto,

The undersigned Ismail Amin, Esq. represents the Defendant iConn, Inc. (“Defendant”) in the above-referenced matter and the undersigned Peter Dee, Esq. represents Plaintiff AMCM Glove LLC (“Plaintiff”) in the above-referenced matter. The undersigned counsel jointly submit this letter.

Your Honor referred Plaintiff and Defendant for a settlement conference before Magistrate Judge Cho, and this settlement conference took place on February 23, 2022. During the settlement conference, Defendant and Plaintiff agreed that in furtherance of facilitating productive settlement discussions, they will informally exchange documents within the next thirty (30) days, and will then decide whether to request a continued settlement conference with Magistrate Judge Cho. In this regard, Magistrate Judge Cho has requested a status update from the parties by March 23rd.

Additionally, Defendant served a Motion to Dismiss Plaintiff’s Amended Complaint in this matter on Plaintiff on February 14, 2022. Your Honor previously approved a briefing schedule under which Plaintiff’s Opposition to the Motion to Dismiss would be due on March 7, 2022 and Defendant’s Reply Brief would be due on March 21, 2022. However, in light of the parties’ ongoing settlement efforts, and to avoid unnecessary motion practice if those efforts prove to be fruitful, Plaintiff and Defendant wish to extend the briefing deadlines for the Motion to Dismiss as follows:

Plaintiff to Serve Opposition on Defendant: April 13, 2022

Defendant to Serve Reply Brief on Plaintiff: April 27, 2022.

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Letter re: Motion to Dismiss Briefing Schedule
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Therefore, Defendant and Plaintiff respectfully request that this Court enter an order setting this above-described amended briefing schedule for Defendant's Motion to Dismiss Plaintiff's Amended Complaint.

Very Truly Yours,

/s/Ismail Amin

Ismail Amin, Esq.
THE AMIN LAW GROUP, LTD.

Very Truly Yours,

/s/Peter Dee

Peter Dee, Esq.
TUTTLE YICK LLP

ATTORNEY AFFIRMATION OF SERVICE

STATE OF CALIFORNIA :

SS.:

COUNTY OF ORANGE :

I, Ismail Amin, an attorney at law admitted Pro Hac Vice to practice before this Court, affirms as follows:

On the 23rd day of February 2022, I served the within Joint Letter to Judge Matsumoto Re: Motion to Dismiss Briefing Schedule upon the following:

Peter C. Dee, Esq.
Tuttle Yick, LLP
352 Seventh Avenue, 14th Fl
New York, NY 10001
Counsel for AMCM GLOVE LLC

the addresses designated by said attorneys for that purpose by depositing a true copy of same enclosed in a postpaid properly addressed wrapper in - a post office – official depository under the exclusive care and custody of the United States post office department within the State of New York and by email to pdee@tuttlewick.com.

DATED: 02/23/2022

/s/ Ismail Amin
Ismail Amin, Esq.